

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 435**

**CERTIFICATION OF COUNSEL REGARDING  
MOTION OF OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS FOR  
ENTRY OF AN ORDER PERMITTING SECURITIES TRADING UPON  
ESTABLISHMENT OF A SCREENING WALL**

I, Brya M. Keilson, hereby certify as follows:

1. On September 19, 2023, the Official Committee of Equity Security Holders (the “Committee”), appointed in the Chapter 11 cases of Lordstown Motors Corp. and its affiliates, filed the *Motion of Official Committee of Equity Security Holders for an Order Permitting Securities Trading Upon Establishment of a Screening Wall* [Docket No. 435] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The deadline to object to the Motion was September 28, 2023 at 4:00 p.m. (ET).

3. The Committee received informal comments from the United States Trustee (the “US Trustee”) and the Debtors (collectively with the US Trustee, the “Parties”) regarding the proposed form of Committee Personnel letter and proposed form of order, both attached as exhibits to the Motion.

4. A revised letter (“Revised Letter”) incorporating the Parties’ comments is attached hereto as **Exhibit 1**. The Parties do not object to entry of the Revised Letter. A redline

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

comparing the Revised Letter to the letter filed as an exhibit to the Motion is attached as **Exhibit 2**.

5. A revised order ("Revised Order") incorporating the Parties' comments is attached hereto as **Exhibit A**. The Parties do not object to entry of the Revised Order. A redline comparing the Revised Order to the order filed with the Motion is attached as **Exhibit B**.

6. The undersigned counsel is available should the Court have any concerns with respect to the foregoing, and respectfully requests that the Court enter the proposed Revised Order at its earliest convenience.

Dated: October 2, 2023

**MORRIS JAMES LLP**

/s/ Brya M. Keilson

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*Proposed Counsel to the Official Committee of  
Equity Security Holders*